

DOCKET NO. 2001.10.241.WT0  
U.S. SERIAL NO. 10/034,394  
PATENT

**REMARKS**

Claims 1-21 were originally filed in the present application.

Claims 1 -21 have been rejected.

No claims have been amended.

Claims 1-21 remain in the application.

Reconsideration of Claims 1-21 is respectfully requested.

In Section 3 of the July 26, 2005 Office Action, the Examiner rejected Claims 1-21 under 35 U.S.C. § 103(a) as being unpatentable over Timothy Bickmore, et al., *Web Page Filtering and Re-Authoring for Mobile Users*, 42 COMPUTER J. 534 (1999) ("*Bickmore*") in view of U.S. Patent No. 6,489,976 to *Patil et al.*, ("*Patil*"). The Applicant respectfully traverses the rejection.

The Applicant draws the Examiner's attention to Claim 1, which contains the unique and non-obvious limitations emphasized below:

1. For use in a browser, a converter for automatically adapting markup language documents for display in small areas comprising:

a conversion controller for scanning a portion of markup language source selected for display for tags associated with graphical elements and automatically replacing each detected graphical element within the selected markup language source portion with one of a plurality of placeholders having labels corresponding to a set of buttons,

wherein the plurality of placeholders are reused to replace detected graphical elements within other portions of the markup language source when such other portions are selected for display. (*emphasis added*)

The Applicant respectfully asserts that the above-emphasized limitations are not disclosed in the *Bickmore* reference, the *Patil* reference, or in the combination of the *Bickmore* reference and the *Patil* reference.

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The *Bickmore* reference describes a system for displaying Web pages on devices with limited communications bandwidth and small displays. See *Bickmore*, col. 4, line 60, through col. 5, line 2. When the *Bickmore* system encounters an image in a Web page, it replaces the full-size image with a reduced-size version of the image, which is also a hyperlink to the full-size image. See *Bickmore*, col. 11, lines 23-26. The *Bickmore* reference teaches that a hyperlink is followed using a dedicated 'LINKS' button. See *Bickmore*, Fig. 3, col. 6, lines 6-9.

The Examiner acknowledges that the *Bickmore* reference fails to describe placeholders having labels corresponding to buttons, but asserts that the *Patil* reference provides such a teaching at column 4, lines 36-40. The Examiner further argues that it would have been obvious to an artisan at the time of the invention to combine the method of *Bickmore* with the teaching of *Patil*, the suggested motivation being to provide a convenient way of initiating a link besides the conventional point and click method. The Applicant respectfully submits: i) that the Examiner mischaracterizes the teaching of the *Patil* reference; ii) that there is no suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to combine the reference teachings; and iii) that the proposed combination of the *Bickmore* and *Patil* systems would not result in the invention as recited in Claim 1.

The *Patil* reference describes a system that displays pop-up accelerator key symbols when a user holds down a command button (such as ALT) on a computer keyboard. See *Abstract of Patil*. The pop-up symbols are displayed adjacent to the toolbar icons to which accelerator keys are mapped, so that the user may determine which key to press in order to activate a desired icon. See

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*Patil, Fig. 1.* As such, the Applicant respectfully submits that the pop-up symbols are not placeholders used to replace graphical elements, as recited in Claim 1, but rather labels used to identify accelerator keys assigned to toolbar icons.

The *Patil* reference discloses that toolbar icons have the drawback of requiring a user to remove one hand from the keyboard in order to use a mouse to point and click on a desired icon. The Examiner suggests this as the motivation for combining the teaching of the *Patil* reference with the method of the *Bickmore* reference. Because a cellphone typically has no mouse, the problem overcome by the *Patil* system does not arise while using a cellphone. Furthermore, the *Bickmore* reference already describes a method for using the keys of a cellphone to display and navigate Web pages. Neither the *Bickmore* reference nor the *Patil* reference describes any shortcomings of the *Bickmore* method that would be overcome by the teachings of the *Patil* reference.

Thus, the Applicant respectfully submits that there is no suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to combine the reference teachings. The alleged motivation to combine the *Bickmore* reference and the *Patil* reference originates by considering the Applicant's invention in hindsight.

Finally, even if the *Bickmore* and *Patil* references were to be combined, the combination would not teach, suggest, or even hint at the Applicant's invention as set forth in Claims 1. Application of the teachings of the *Patil* reference to the cellphone Web browser of the *Bickmore* reference would result in a browser that permitted a user to press a command button to cause the browser to show pop-up symbols adjacent to reduced-size images and other hyperlinks in a page

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being displayed. Thus, the combined system would neither replace graphical elements with placeholders, nor do so automatically, as recited in independent Claim 1.

As such, the Applicant respectfully asserts that independent Claim 1 contains unique and novel limitations that are not disclosed, suggested or even hinted at in the *Bickmore* reference, the *Patil* reference, or in the combination of the *Bickmore* reference and the *Patil* reference. This being the case, Claim 1 present patentable subject matter over the cited prior art. Also, Claims 2-7 depend from Claim 1 and contain all of the unique and novel limitations recited in Claim 1. This being the case, Claims 2-7 also are patentable over the cited prior art.

The Applicant notes that amended independent Claims 8 and 15 contain limitations analogous to the unique and novel limitations recited in Claim 1. As such, Claims 8 and 15 present patentable subject matter over the cited prior art. Also, Claims 9-14, which depend from Claim 8, and Claims 16-21, which depend from Claim 15, contain all of the unique and novel limitations recited in Claims 8 and 15, respectively. Thus, Claims 9-14 and 16-21 are patentable over the *Bickmore* and *Patil* references.

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**SUMMARY**

For the reasons given above, the Applicant respectfully requests reconsideration and allowance of pending claims and that this Application be passed to issue. If any outstanding issues remain, or if the Examiner has any further suggestions for expediting allowance of this Application, the Applicant respectfully invites the Examiner to contact the undersigned at the telephone number indicated below or at *jmockler@davismunck.com*.

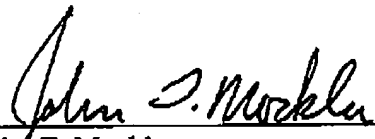
The Commissioner is hereby authorized to charge any additional fees connected with this communication or credit any overpayment to Deposit Account No. 50-0208.

Respectfully submitted,

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